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6
7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,) Case No.: 2:06-cr-00530-FMC-2
10)
Plaintiff,)
11 vs.) DEFENDANT'S *EX PARTE* APPLICATION
GREG WONG) FOR EXTENSION OF TIME TO PAY
12) RESTITUTION
Defendant.)
13) Hon. Florence-Marie Cooper
14)

15 Defendant Greg Wong, by and through his attorney, Eric A. Chase, submits this *ex parte*
16 application ("Application") to request additional time in which to make the restitution payment
17 of \$250,000 ordered by the Court. This Application is based on the grounds that Defendant has
18 been unable to obtain the necessary financing to pay restitution. Defendant respectfully asks the
19 Court to extend the deadline by which his restitution payment of \$250,000 is due to September 1,
2009.

21 **DISCUSSION**

22 This Court sentenced Defendant on December 10, 2008, to 3 years of probation. As a
23 condition of probation, the Court ordered the Defendant to be placed on home detention for 12
24 months, perform 200 hours of community service, and make a partial restitution payment of
25 \$250,000 and a monthly payment of at least \$200 for the duration of supervised release. The
26 Court ordered Defendant to be jointly and severally liable with his co-defendants for the total
27 restitution amount of \$2,897,893.00, but made a finding that "the defendant's economic
28 circumstances do not allow for either immediate or future payment of the amount ordered."

1 The Court specified that Defendant pay the \$250,000 partial restitution within 60 days
2 after sentencing. On February 6, 2009, an attorney for Defendant wrote a letter to Probation
3 Officer Consiglio advising her that he is working on obtaining financing to make the restitution
4 payment and that he requires additional time to secure said funds. That deadline was then
5 extended to July 1, 2009. However, Defendant has still been unable to obtain the moneys for the
6 restitution payment.

7 Defendant has recently retained the law firm of United Defense Group, LLP, to assist him
8 in, *inter alia*, obtaining financing to pay his restitution obligations. Defendant's new attorneys
9 expect that funds will be available within 30 days but request 2 months in the event that delays
10 arise.

11 WHEREFORE, Defendant asks this Court to grant this Application and extend the
12 restitution payment date to September 1, 2009.
13

14 Respectfully Submitted,
15 UNITED DEFENSE GROUP, P.C.

16 By: /s/ Eric A. Chase

17 Eric A. Chase
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22 Attorney For Defendant,
23 GREG WONG
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CERTIFICATE OF SERVICE

I, Oren Rosenthal, hereby declare:

That I am a citizen of the United States and employed in Los Angeles County, California; that my business address is United Defense Group, LLP, 4181 Sunswept Dr., Suite 100, Studio City, CA 91604; that I am over the age of eighteen years, and am not a party to this action.

That on July 1, 2009, I served a copy of DEFENDANT'S *EX PARTE* APPLICATION FOR EXTENSION OF TIME TO PAY RESTITUTION as follows:

Via Facsimile:

Deborah Yniguez Consiglio
United States Probation Officer
Fax: 626-814-8639

_____/s/
Oren Rosenthal